

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SAS MFG INC. and ALLAN D. BAIN,

Plaintiffs,

V.

SAFE LIFE DEFENSE LLC, and
NICHOLAS GROAT,

Defendants.

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Case No.: 4:24-cv-002923

**DECLARATION OF NICHOLAS GROAT IN SUPPORT OF DEFENDANT SAFE LIFE
DEFENSE LLC'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION
PURSUANT TO FED. R. CIV. P. 12(B)(2)**

I, NICHOLAS GROAT declare that:

1. I am over the age of eighteen years and am a resident of the State of Nevada. I make this declaration in support of Defendant Safe Life Defense LLC's Motion to Dismiss for Lack of Personal Jurisdiction Pursuant to Fed. R. Civ. P. 12(b)(2).

2. I make this declaration based on my personal knowledge of the facts contained herein. If called as a witness, I could and would testify competently to the recitations set forth herein.

3. I am the founder and manager of Safe Life Defense LLC (“Safe Life”). I have served in that capacity since the company’s formation in 2016.


4. Safe Life is a Nevada limited liability company with a principal place of business in Nevada.

5. Safe Life does not maintain any physical offices or locations in Texas.

6. Safe Life does not own or rent any real property in Texas.
7. Safe Life does not have any agents for service of process and is not registered to do business in Texas.
8. Safe Life does not manufacture goods in Texas.
9. Safe Life has 86 employees, none of which live or work in Texas.
10. Safe Life's website and advertising efforts are targeted to the world, not the State of Texas.
11. Safe Life did not undertake any action that in any way involved the State of Texas in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of September, 2024.



NICHOLAS GROAT